

IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO

IN RE:
NELSON VARGAS CORDERO
MARY J. RODRIGUEZ QUIÑONES

Case No. 98-10612 (ESL)

Debtors

CHAPTER 13

IN RE:
NELSON VARGAS CORDERO
MARY J. RODRIGUEZ QUIÑONES

Plaintiffs

vs.

COOPERATIVA DE AHORRO Y CREDITO
NUESTRA SEÑORA DE LA CANDELARIA; X,
Y, and/or Z INSURANCE CO.; JOHN DOE AND
JANE ROE

Adv. No. 11-00151- ESL

Defendants

VIOLATION OF DISCHARGE
INJUNCTIVE RELIEF / CONTEMPT
/ DAMAGES

JOSE CARRION MORALES
CHAPTER 13 TRUSTEE/PARTY IN INTEREST
CASE 11-02484-BKT

MOTION REQUESTING CONTINUANCE

TO HONORABLE COURT:

Come now, Cooperativa de Ahorro y Crédito La Candelaria (hereinafter Candel Coop),
that respectfully states, prays, and requests as follows:

In the case at bar the Court scheduled a Pre-Trial Conference for November 18, 2011. For
the reasons set forth herein we request from the Court the continuance of the conference. In the
case at bar the Defendant wishes to undertake discovery but due to health reasons we have not

been able to initiate the discovery in the case at bar. The complaint in this case was answered on October 4, 2011. Shortly thereafter the undersigned Roberto Maldonado was going to initiate discovery by notifying a Request for Production of Documents and by Taking the Deposition of the Debtors, however, due to health reasons the undersigned was not able to do so. The undersigned had a tear in the epithelial membrane of his left eye that became complicated due to a diabetic condition impeding our capacity to read for more than three weeks. (A medical certification may be submitted if required).

Given the need of additional this to initiate and finish the discovery a continuance is requested in the Pre-Trial Conference for which we have available the following dates: February 17, 22, and 28, 2012.

WHEREFORE, it is respectfully requested from the Court to grant us the continuance.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 14th day of November, 2011.

I hereby certify that on this same date a true and exact copy of this motion was sent to Edwin Matos Maldonado and Felix Zeno Gloró through the Electronic Case Management System just as to: Nancy Pujals, Esq.- nancy.pujals@usdoj.gov; Monsita Lecaroz, Esq. - monsite.lecaroz@usdoj.gov.

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